

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: CHENELL NYREE RAGIN	:	CHAPTER 13
	:	
Debtors.	:	20-00298-RNO
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BANK OF AMERICA, N.A.	:	
	:	
Movant,	:	
	:	
v.	:	11 U.S.C. §362
	:	
CHENELL NYREE RAGIN and	:	
CHARLES J. DeHART, III	:	
	:	
Respondents	:	

ANSWER TO MOVANT’S MOTION FOR RELIEF

AND NOW, comes the Debtor, Chenell Ragin, by and through her Attorney, Patrick J. Best, of ARM Lawyers, who hereby answers as follows:

1. Admitted.

2. Admitted.

3. Admitted.

4. Admitted.

5. Admitted.

6. Admitted in part and denied in part. It is admitted that the Plan calls for direct payments; however, the Plan also calls for a mortgage modification. Debtor intended to resume direct payments after the mortgage was modified.

7. Admitted in part and denied in part. Debtor did not make direct mortgage payments, but has complied with the Plan. Debtor is in active loss mitigation.

8. Denied. Debtor has complied with the Plan and is in active loss mitigation.

9. Denied. For the reasons set forth above, Movant lacks cause to modify the Automatic Stay.

10. Admitted.

11. This averment does not require an answer, but to the extent an answer is required, the same is denied.

WHEREFORE, Debtor respectfully requests that this Honorable Court deny Movant's Motion for Relief.

Date: February 9, 2021

/s/ Patrick J. Best
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